

## REMARKS

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1-20 are pending in this application, with Claims 1, 19, and 20 being independent.

Claims 1, 19, and 20 have been amended. Applicant submits that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

Applicant appreciates the indication that Claims 4-14 contain allowable subject matter and would be allowable if rewritten in independent form. However, those claims have not been rewritten in that manner at this time because, for the reasons presented below, Applicant believes the independent claims are allowable.

Claims 1 and 19 stand rejected under 35.U.S.C. §102 as being anticipated by the article “Edge Oriented Block Motion Estimation for Video Coding” by Chan et al. Claims 1-3, 15, 16, and 18-20 stand rejected under Section 102 as being anticipated by U.S. Patent No. 6,343,097 (Kobayashi et al.). Claims 17 and 20 were also variously rejected under 35 U.S.C. §103 as being obvious over Chan et al. or Kobayashi et al. These rejections are respectfully traversed for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the feature of setting an initial contour of an object area on the basis of a border block judged in accordance with a detected motion vector, and extracting the object area using the set initial

contour and an active outline model. Independent Claims 19 and 20 recite similar features.

Applicant submits that the cited art fails to disclose or suggest at least these features.

Chan et al. discloses judging a border block of an object area to detect a motion vector of the object area with precision. See, e.g., page 138, right column - page 139, left column. However, that article does not disclose or suggest setting an initial contour of an object area on the basis of a judged border block, or using the set initial contour and an active outline model to extract the object area.

Kobayashi et al. discloses judging an image area having motion to form a motion-compensation prediction image. See Fig. 4. That patent also teaches setting a contour of an area having motion on the basis of a border block to extract that image area. See, e.g., Figs. 8A-8D and col. 10, lines 52-53. However, Kobayashi et al. likewise fails to disclose or suggest setting an initial contour of an object area on the basis of a judged border block and extracting the object area using the set initial contour and an active outline model.

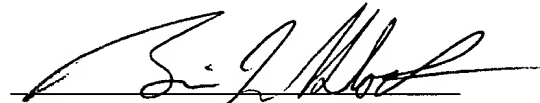
For the foregoing reasons, Applicant submits that the cited references fail to disclose or suggest certain features of the independent claims, and therefore those claims are patentable, whether the references are considered individually or taken in combination.

The dependent claims recite additional features that further distinguish the claimed invention from the cited art. Further individual consideration of the dependent claims is requested.

In view of the foregoing, Applicants submit that this application is in condition for allowance. Favorable consideration, entry of this Amendment, withdrawal of the outstanding rejections, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian L. Klock", is written over a horizontal line.

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